

REMARKS

The objection to claims 11 and 22 has been corrected.

The rejection based on Campbell is not understood. It is asserted that the phase change material is the material 145, 155 and the lower electrode is the item 170 in Figure 11A. This being so, it is readily apparent that the phase change material fills more of the pore than the lower electrode. Therefore, Campbell fails to anticipate the claimed invention.

While it may be that the present Applicant invented before Campbell, in view of this distinction, it does not appear to be necessary at this time to antedate the reference.

For example, it is specifically conceded that this element is not shown in connection with the rejection of claim 22.

The attempt to combine Moore and Campbell makes no sense. It is suggested that making the phase change material fill less of the pore than the electrode in Campbell's structure would be done "in order to greatly enhance the efficiency of the device." However, it is not seen why this is so. Moreover, nothing in either reference teaches it.

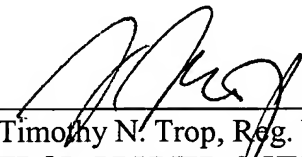
The fact of the matter is there is no rationale to combine the two references which operate in very different ways. None of the references teach any reason to have the claimed arrangement wherein the phase change material fills less of the pore than the lower electrode. Therefore, one skilled in the art would have no reason to pick and choose from among the elements.

In other words, one skilled in the art would have no reason to leave out the feature of Moore of the phase change material be free of material from the lower electrode, while picking the elements from Campbell which the Examiner contends teach the opposite. Moreover, there would be no reason to change the correspondence between the amount of material in the pore made up of phase change material and the amount of material in the pore made up of the lower electrode.

Therefore, there is no rationale to make the claimed combination and, therefore, a *prima facie* rejection is not made out.

Respectfully submitted,

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